

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA AT ELKINS**

**FRIEDRICHS HARRIS, ADMINISTRATOR OF  
THE ESTATE OF EVAN M. HARRIS,**

**Plaintiff,**

**v.**

**CIVIL ACTION NO.: 2:16-cv-00046  
JUDGE BAILEY**

**Q&A ASSOCIATES, INC.,  
ANGELA SHOCKLEY, KEITH BISHOP,  
MATTHEW SHOCKLEY, SANDY  
SCHMIEDEKNECHT, and TAMMY ROBBINS.**

**Defendants.**

**MOTION TO EXTEND THE JOINDER AND AMENDMENT DEADLINE**

COME NOW the Plaintiff, Friedrichs Harris, by counsel, David A. Sims, and the Defendants, Q&A Associates, Inc., Angela Shockley, Keith Bishop, Matthew Shockley, Sandy Schmiedeknecht, and Tammy Robbins, by counsel, Thomas V. Flaherty, Lindsey M. Saad, and John T. McCartney, and move this Court extend the Joinder and Amendments deadline in the Amended Scheduling Order until November 15, 2017.

1. On June 12, 2017, the Court entered the Amended Scheduling Order in this matter, which set the joinder and amendment deadline for September 29, 2017.

2. Since the entry of the Scheduling Order, the parties have worked to conduct discovery. However, due to circumstances outside of the control of the parties, there has been a delay in conducting adequate discovery for the parties to be able to identify whether there are additional parties that should be joined in this action by September 29, 2017.

3. The parties respectfully request that this Court extend the current deadline to November 15, 2017.

4. There will be no prejudice to any of the parties should the Court grant the extension. With this extension, ample time will still remain for the parties to conduct discovery, which is to be completed by January 31, 2018.

5. Accordingly, Defendants move this Honorable Court to extend the aforementioned deadline. A proposed Order is attached hereto as Exhibit A.

**Prepared by:**

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**Agreed to by:**

s/ David A. Sims w/ permission  
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CORPORATION, ANGELA SHOCKLEY, KEITH  
BISHOP, MATTHEW SHOCKLEY, AND SANDY  
SCHMIEDEKNECHT, and TAMMY ROBBINS.**

**Defendants.**

**CERTIFICATE OF SERVICE**

I certify that on this 28th day of September, 2017, I filed electronically via CM/ECF a true copy of “**MOTION TO EXTEND THE JOINDER AND AMENDMENT DEADLINE**” with notice of the same being electronically served by the Court, addressed to the following:

David A. Sims, Esq.  
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Vienna, WV 26105

/s/ Lindsey M. Saad  
\_\_\_\_\_  
Lindsey M. Saad (WV Bar No. 11155)